



Amy G. Rabinowitz
Counsel

March 25, 2004

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Re: D.T.E. 03-124

Dear Secretary Cottrell:

I am enclosing for filing the responses of Massachusetts Electric Company and Nantucket Electric Company (collectively "Company") to Attorney General's Second Set of Document and Information Requests AG-MECO 2-1 and AG-MECO 2-2. The Company seeks confidential treatment of its response to AG-MECO 2-3, as set forth in the attached motion for confidentiality. Accordingly, I am providing the Company's response to AG-MECO 2-3 directly to Hearing Officer John Geary.

Thank you very much for your time and attention to this matter.

Very truly yours,

Amy G. Rabinowitz

cc: John J. Geary, Hearing Officer
Alexander J. Cochis, Office of the Attorney General

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COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

_____)	
Massachusetts Electric Company and)	
Nantucket Electric Company Exogenous)	D.T.E. 03-124
Factor Filing)	
_____)	

**Supplemental Motion of Massachusetts Electric Company and Nantucket Electric
Company for Confidential Treatment**

Pursuant to Mass. Gen. Laws c, 25, §5D and the Department's procedural rules at 220 C.M.R. §1.04(5)(a) and (c), Massachusetts Electric Company and Nantucket Electric Company (collectively "Company") hereby move for confidential treatment of the response to Attorney General Information Request AG-MECO 2-3. This Supplemental Motion supplements the Motion of Massachusetts Electric Company and Nantucket Electric Company for Confidential Treatment filed February 18, 2004 in this docket ("Motion"). In the Motion, the Company set forth the applicable standard for granting protective status to confidential information. The Company incorporates that discussion into this Supplemental Motion.

The Company is providing one hard copy of the response to AG-MECO 2-3 to Hearing Officer John Geary under seal, on the premise that it will be held in confidence in the Department's offices and will not be distributed unless the Department denies this Supplemental Motion. The Company has redacted the response from its electronic filing.

In response to AG-MECO 2-3, the Company provides the identity of the two Standard Offer suppliers referenced on Exhibit MJH-5, an exhibit which shows Standard Offer expense billed by ISO-NE. The Company also provides invoices which support the data on Exhibit MJH-5. Although the identity of the Company's Standard Offer suppliers itself is not confidential,

disclosing the identity of the Standard Offer suppliers referenced on Exhibit MJH-5 and the supporting invoices will enable market participants to glean information about how the Company is implementing and administering its contracts. This will negatively impact the Company's competitive position with these and other Standard Offer suppliers. It will have adverse competitive effects on future bids for both Default and Standard Offer service and will compromise the Company's ability to negotiate optimal competitive contracts, to the detriment of the Company's customers. It will also negatively impact the Company's litigation position with these and other Standard Offer suppliers. It will compromise the Company's ability to resolve disputes with certain suppliers, both formally and informally.

For these reasons, the limited information and documents for which the Company is requesting confidential status meets the Department's requirements for protection.

WHEREFORE, for the reasons set forth herein, the Company respectfully requests that the Department grant the requested Motion for Confidential Treatment, pursuant to G.L. c. 25, §5D and the Department's procedural rules at 220 C.M.R. §1.04(5)(a) and (c).

Respectfully submitted,
MASSACHUSETTS ELECTRIC COMPANY
NANTUCKET ELECTRIC COMPANY
By their attorney,

Amy G. Rabinowitz
25 Research Drive
Westboro, MA 01582

Dated: March 25, 2004

CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2004, I served a copy of the Supplemental Motion of Massachusetts Electric Company and Nantucket Electric Company for Confidential Treatment on the Service List in D.T.E. 03-124 by personal delivery or first class mail.

Signed under the pains and penalties of perjury

Amy G. Rabinowitz
Attorney for Massachusetts Electric Company and
Nantucket Electric Company

Dated: March 25, 2004

Massachusetts Electric Company
Nantucket Electric Company
Docket No. D.T.E. 03-124
Responses to Attorney General's Second Set of Data Requests

AG-MECO-2-1

Request:

Please provide the source and backup documentation (including invoices) for the \$50/REC 2003 Alternative Compliance Payment data supplied in the MECO response to AG-MECO-1-2.

Response:

The 2003 Alternative Compliance Payment rate is established in 220 CMR 14.08(4)(a)(2).

To date, the Company has not made any Alternative Compliance Payments.

Prepared by or under the supervision of: Michael J. Hager

Massachusetts Electric Company
Nantucket Electric Company
Docket No. D.T.E. 03-124
Responses to Attorney General's Second Set of Data Requests

AG-MECO-2-2

Request:

Referring to the response to AG-MECO-1-11, please provide the amount of expense by month associated with the environmental disclosure label compilation efforts described in the response. Provide hours worked, personnel counts with position titles, labor rates and associated overhead factors. Also, please provide all spreadsheets that were created to answer this question.

Response:

The compilation of information is performed on a quarterly basis.

The Company has provided an estimate of the annual cost to provide environmental disclosure labels in Exhibit MJH-2 to its filing in Docket No. DTE 03-88E. A copy of this exhibit is attached.

The costs shown in the attached exhibit are expected to be the same whether the Company compiles the information manually or utilizes the NEPOOL GIS system reports.

Prepared by or under the supervision of: Michael J. Hager

**Massachusetts Electric Company
Nantucket Electric Company
Estimate of Costs Associated with
Environmental Disclosure Labels**

<u>Task</u>	<u>Conducted by</u>	(A)	(B)	(C)	(D)
		<u>Hours</u>	<u>Direct Labor Rate (\$/hr)</u>	<u>Indirect / Overhead Rate</u>	<u>Total \$</u>
Request/receive data from suppliers, update database, calculate values for current quarterly label	Energy Supply: Analyst	8.0	\$40.00	80.5%	\$578
	Total for Task:	8.0			
	Annual Frequency for Task:	4			
	Annual Total for Task:	32.0			\$2,310
Prepare proofs for printing, check for accuracy, schedule for insertion, post to website	Corporate Communications: Analyst	4.0	\$40.00	92.1%	\$307
	Customer Service: Analyst	4.0	\$40.00	104.6%	\$327
	Total for Task:	8.0			\$635
	Annual Frequency for Task:	4			
	Annual Total for Task:	16.0			\$1,229
Print labels	Third Party Vendor	n/a	n/a	n/a	\$2,000
	Annual Frequency for Task:	4.00			
	Annual Total for Task:	n/a			\$8,000
Annual Total for all Tasks:		48.0			\$11,540

Notes:

- (A) Based on interviews with departments/personnel involved in each task which relied on experience from prior labels.
(C) Source: Average departmental overhead accrual rates for year ended December 31, 2003

Massachusetts Electric Company
Nantucket Electric Company
Docket No. D.T.E. 03-124
Responses to Attorney General's Second Set of Data Requests

AG-MECO-2-3

Request:

Please provide the names of Supplier 1 and Supplier 2 on Exhibit MJH-5 and the supplier bills to support the data.

Response:

The Company has requested confidential treatment of the response to this request. A confidential response to this request has been provided under separate cover.

Prepared by or under the supervision of: Michael J. Hager